

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

UNITED STATES OF AMERICA,	)	
	)	
v.	)	
	)	Criminal No. 1:19-cr-334-3 (LMB)
JINGYUAN LI,	)	
	)	
Defendant.	)	

DEFENDANT'S SUPPLEMENTAL POSTION  
WITH RESPECT TO SENTENCING FACTORS

COMES NOW the Defendant, by counsel, and respectfully submits this supplemental sentencing memorandum.

The Defendant accepts responsibility for the offenses for which he pled guilty and seeks to clarify statements he made at his sentencing hearing on July 13, 2021. The Court recessed the sentencing hearing after it appeared the Defendant was taking a position inconsistent with his prior admissions in the Statement of Facts. The Defendant offers the explanation set forth below to support his acceptance of responsibility with respect to the offense conduct.

Introduction of Q. Chen to J. Chen

At a prior sentencing hearing, prior counsel argued the Defendant was an average participant and asked the Court to impose a sentence of 60 months. The Court observed the Defendant could have received a role increase, in part, because he introduced Qiyun Chen to Jianxiang Chen for the purpose of engaging in money laundering. Sentencing Transcript, p. 6.

The Defendant laundered money for Xizhi Li. Q. Chen was the mistress of X Li. Q. Chen asked the Defendant to launder drug proceeds for her, because she believed that she was not receiving adequate monies from X Li. The Defendant refused to launder money for Q. Chen, primarily because X Li threatened him. As a result, Q. Chen asked the Defendant if he knew anyone else who would assist her. The Defendant directed her to J. Chen, who was the Guatemalan-casino business partner of her paramour, X. Li. Although the Defendant hoped to

financially benefit from the introduction, he never did.

Use of Shuoyu USA, Inc. to Launder Money

In the Statement of Facts, the Defendant agreed that he used a seafood import/export business known as Shouyu USA to launder money on behalf of Mexican drug trafficking organizations. The Defendant wants the Court to know that he was one of a number of employees who worked for the company, and who assisted in the trade-based money laundering venture, but was not the owner of the company.

Unwarranted Sentencing Disparity

On October 20, 2020, the Court sentenced another defendant to 60 months. Since the time of his sentencing, it is clear that his role in the conspiracy is similar in nature to that of the Defendant Li. In order to avoid an unwarranted sentencing disparity, Defendant Li respectfully requests the Court to sentence him to a term of 60 months.

Respectfully submitted,

JINGYUAN LI

By Counsel

/s/ Pleasant S. Brodnax, III

Pleasant S. Brodnax, III, VSB No. 26477  
1701 Pennsylvania Avenue, NW, Suite 200  
Washington, D.C. 20006  
(202) 462-1100  
[pleasant.brodnax@gmail.com](mailto:pleasant.brodnax@gmail.com)

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed by CM/ECF on the 5<sup>th</sup> of November 2021, with the Clerk of the Court using the CM/ECF system which will send a Notice of Electronic Filing (NEF) to all counsel of record.

/s/ Pleasant S. Brodnax, III

Pleasant S. Brodnax, III